

1 **DIEMER & WEI, LLP**
2 Kathryn S. Diemer (#133977)
3 55 S Market Street, Suite 1420
4 San Jose, CA 95113
5 Telephone: 408-971-6270
6 Facsimile: 408-971-6271
7 Email: kdiemer@diemerwei.com

8 **WILLKIE FARR & GALLAGHER LLP**

9 Matthew A. Feldman (*pro hac vice*)
10 Joseph G. Minias (*pro hac vice*)
11 Benjamin P. McCallen (*pro hac vice*)
12 Daniel I. Forman (*pro hac vice*)
13 787 Seventh Avenue
14 New York, NY 10019-6099
15 Telephone: (212) 728-8000
16 Facsimile: (212) 728-8111
17 Email: mfeldman@willkie.com
18 jminias@willkie.com
19 bmccallen@willkie.com
20 dforman@willkie.com

21 *Counsel for Ad Hoc Group of Subrogation Claim Holders*

22 **UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

23 **In re:**

24 **PG&E CORPORATION,**

25 **-and-**

26 **PACIFIC GAS AND ELECTRIC
COMPANY,**

27 **Debtors.**

28 Chapter 11
Bankr. Case No. 19-30088 (DM)
(Jointly Administered)

**NOTICE OF FILING OF INSURER
ADOPTION AGREEMENT REGARDING
MUTUAL MADE WHOLE RELEASE**

28
29 Affects PG&E Corporation
30 Affects Pacific Gas and Electric
31 Company
32 Affects both Debtors

33 *All papers shall be filed in the lead case,
34 No. 19-30088 (DM)

The Ad Hoc Group of Subrogation Claim Holders (the “**Ad Hoc Subrogation Group**”) in the above-captioned chapter 11 cases of PG&E Corporation and Pacific Gas and Electric Company (collectively, “**Debtors**”), by its attorneys Willkie Farr & Gallagher LLP and Diemer & Wei, LLP, hereby submits this notice (the “**Notice**”) pursuant to the requirements of the Mutual Made Whole Release. *See Debtors’ and Shareholder Proponents’ Joint Chapter 11 Plan of Reorganization Dated May 22, 2020* [Docket No. 7521] (the “**Plan**”) at Exhibit C.¹

NOTICE

WHEREAS paragraph I of the Mutual Made Whole Release provides, in part, that “[t]his Mutual Release is conditioned upon the Insurer, or the Insurer’s successor on behalf of the Insurer, filing in the Chapter 11 case the Insurer Adoption Agreement, which states the Insurer releases, as to the Made Whole Doctrine only, each Claimant who signs and agrees to the terms of this Mutual Release.”

NOW, THEREFORE, the Ad Hoc Subrogation Group attaches as Exhibit A to this Notice the Insurer Adoption Agreement with all Insurers' signatures collected to date.²

Capitalized terms used but not defined shall have the meanings ascribed in the Plan.

² In the event that more Insurers sign the Insurer Adoption Agreement, the Ad Hoc Subrogation Group will file subsequent notices in these bankruptcy cases.

1 Dated: June 22, 2020

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3 **WILLKIE FARR & GALLAGHER LLP**

4

5 /s/ Matthew A. Feldman

6 Matthew A. Feldman (*pro hac vice*)

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9 Daniel I. Forman (*pro hac vice*)

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14 Email: mfeldman@willkie.com

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16 bmccallen@willkie.com

17 dforman@willkie.com

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21 San Jose, CA 95113

22 Telephone: (408) 971-6270

23 Facsimile: (408) 971-6271

24 Email: kdiemer@diemerwei.com

25 *Counsel for Ad Hoc Group of Subrogation Claim Holders*